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Attorneys for Stardock Systems, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

STARDOCK SYSTEMS, INC.,

Plaintiff,

vs.

PAUL REICHE III and ROBERT
 FREDERICK FORD,

Defendants.

Case No.: 17-cv-07025-SBA

**STIPULATION AND [PROPOSED]ORDER
 CONTINUING STARDOCK'S DEADLINE
 TO FILE A FOURTH AMENDED
 COMPLAINT AND GOG'S DEADLINE TO
 FILE A RESPONSIVE PLEADING AND
 SERVE WRITTEN DISCOVERY
 RESPONSES**

Complaint Filed: December 8, 2017
 Trial Date: March 23, 2020

AND RELATED COUNTERCLAIM AND
 CROSS-COMPLAINT

STIPULATION AND [PROPOSED]ORDER CONTINUING STARDOCK'S DEADLINE TO FILE A
 FOURTH AMENDED COMPLAINT AND GOG'S DEADLINE TO FILE A RESPONSIVE PLEADING
 AND SERVE WRITTEN DISCOVERY RESPONSES

1 Plaintiff and Counter-Defendant Stardock Systems, Inc. (“Stardock”), Counter-Defendant
2 Valve Corporation (“Valve”), and Counter-Defendants GOG Limited and GOG Poland sp. z.o.o.
3 (“GOG”) on the one hand, and Defendants and Counter-Claimants Paul Reiche III and Robert
4 Frederick Ford (collectively “Reiche/Ford”) hereby jointly request and stipulate as follows:
5

6 **WHEREAS**, on May 14, 2019, this Court issued an “Order Granting Motion to Dismiss
7 Counts Twelve and Thirteen of [Stardock’s] Third Amended Complaint with Leave to Amend
8 and Denying as Moot [Stardock’s] Motion for Leave to File Fourth Amended Complaint” (“the
9 Stardock Order”) (Dkt. 126);
10

11 **WHEREAS**, per the Stardock Order, Stardock was required to file its Fourth Amended
12 Complaint within 14 days of the date of the Order, which is May 28, 2019;

13 **WHEREAS**, on May 14, 2019, this Court issued an “Order Denying GOG’s Motion to
14 Dismiss Count Nine of the Second Amended Counterclaim.” (“the GOG Order”) (Dkt. 127);

15 **WHEREAS**, per FRCP 12(a)(4)(A), GOG’s last day to file a responsive pleading to the
16 Second Amended Counterclaim is May 28, 2019;

17 **WHEREAS**, the deadline for GOG to respond to requests for production of documents
18 served on them by Reiche/Ford is May 29, 2019;

19 **WHEREAS**, on May 28, 2019, the Court issued an Order moving the Close of Written
20 Fact Discovery to June 3, 2019, such that all responses to written discovery are due by that date,
21 to allow for continued settlement negotiations (Dkt. 129, 130); and,
22

23 **WHEREAS**, Stardock, Valve, GOG, and Reiche/Ford wish to delay the aforementioned
24 deadlines to file amended pleadings and responsive pleadings and serve discovery responses in
25 light of the settlement process;
26

**STARDOCK, VALVE, GOG, AND REICHE/FORD HEREBY STIPULATE AS
FOLLOWS:**

1. Stardock shall have up to and until June 3, 2019 to file a Fourth Amended Complaint.

2. GOG shall have up to and until June 3, 2019 to file a responsive pleading to Counter-Defendants' Second Amended Counterclaim, and to respond to the aforementioned discovery.

DATED: May 28, 2019

NIXON PEABODY LLP

By: /s/ Deanne R. Kunze

Deanna R. Kunze
Dawn N. Valentine
Attorneys for Plaintiff and Counter-Defendant
STARDOCK SYSTEMS, INC. and Counter-
Defendant VALVE CORPORATION

DATED: May 28, 2019

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

By: /s/ Stephen C. Steinberg

Stephen C. Steinberg
Attorneys for Defendants and Counter-Claimants
PAUL REICHE III and ROBERT FREDERICK
FORD

1 DATED: May 28, 2019

FRANKFURT KURNIT KLEIN & SELZ PC
A Professional Law Corporation

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5 By: /s/ Jessica Medina
6 Jessica Medina
7 Attorneys for Counter-Defendants
8 GOG LIMITED and GOG POLAND SP. Z.O.O.
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28 STIPULATION AND [PROPOSED]ORDER CONTINUING STARDOCK'S DEADLINE TO FILE A
FOURTH AMENDED COMPLAINT AND GOG'S DEADLINE TO FILE A RESPONSIVE PLEADING
AND SERVE WRITTEN DISCOVERY RESPONSES

ORDER

PURSUANT TO STIPULATION, FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

Dated: _____

Hon. Sandra Brown Armstrong
United States District Court Judge

STIPULATION AND [PROPOSED]ORDER CONTINUING STARDOCK'S DEADLINE TO FILE A
FOURTH AMENDED COMPLAINT AND GOG'S DEADLINE TO FILE A RESPONSIVE PLEADING
AND SERVE WRITTEN DISCOVERY RESPONSES

ECF ATTESTATION

I, Deanna R. Kunze, am the ECF User whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER CONTINUING STARDOCK'S DEADLINE TO FILE A FOURTH AMENDED COMPLAINT AND GOG'S DEADLINE TO FILE A RESPONSIVE PLEADING AND SERVE WRITTEN DISCOVERY RESPONSES. In accordance with Local Rule 5.1, concurrence in and authorization of the filing of this document has been obtained from Stephen C. Steinberg, counsel for Defendants, and Jessica Medina, counsel for Counter-Defendants, and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

DATED: May 28, 2019

NIXON PEABODY LLPBy: /s/ Deanna R. Kunze

Deanna R. Kunze

Attorneys for Plaintiff and Counter-Defendant
Stardock Systems, Inc. and Counter-Defendant
Valve Corporation